

From: Peter Henchman [pchench@bigpond.net.au]
Sent: Monday, 4 July 2011 4:54 PM
To: BA - Plant Biosecurity Contact
Subject: Review of fresh apple fruit from New Zealand

This is a submission in response to the draft report on this topic.

I understand the conditions suggested by Biosecurity in its first report were rejected by the WTO as too severe. It is not my understanding that WTO said there could be no conditions, just that they must be revised. Surely the proper response from Biosecurity would be to revisit the conditions and modify them to meet the WTO objections. The draft report however amounts to a total surrender on the question of conditions - effectively Australia is devising no restrictions directed to the prevention of disease entering the country.

You find that New Zealand has an IFP manual for apples for export fruit. And you are saying that if the manual is followed by a producer, there is a very low level of risk of introduction of fireblight. Integrated fruit production is a system for producing apples which contains recommendations as to how various steps in the process should be handled. Indeed it is practised in this country. There is no element of compulsion in it. It is directed long term to achieving the minimum necessary intervention against pests - rejecting the old idea of cover sprays in favour of action only when a pest is present in unacceptable numbers. That carries with it the consequence that some low level presence of a pest is not necessarily a reason for action, so in harvested fruit some pest may well be present. Every manager of an orchard who claimed to be applying IFP would be likely to approach each step in the process in a different way, with different emphases on different points, and different ideas of when intervention was necessary. While quite possibly not following every point, he would say hand on heart that he was applying IFP. Export fruit could have a whole range of levels of infestation and still claim to be produced under IFP. This is not good enough for Australia to rely on.

On top of that, we are not even allowed to know what the manual contains. We have to believe a grower who says he has followed some or all of the voluntary steps in a program of which we know none of the details. It is absurd if experts in this country (growers) are not allowed to know and comment on the system that NZ growers are allegedly following. It is absurd if the Director feels he can make a decision on the import when he has never considered the system which underlies the main condition he is imposing.

I am also very uneasy about the use of streptomycin on apples which come to this country and more so about the risk that in future we may find ourselves forced to use that spray here.

Finally I would argue that it defies logic that you can assess on a severity scale of 6 the likelihood of importation, distribution, establishment and spread, with conclusions of 5, 2, 6 and 6, add to that high consequences, and yet end up with an overall severity risk of 2.

I find it difficult to accept your assessment of the risk if distribution as extremely low. We grow apples within 100 km of Sydney and even closer to other parts of the Cumberland Plain and think it would be very easy for an apple core to be dropped in our area where local insects could access it.

I would urge a rethink of the conditions to be imposed on the import to reflect a better protection of the future of our industry and the people who work in it.

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